

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLINT ROBERT SCHRAM,

Defendant.

Case No. 20-06002-01-CR-SJ-DGK

GOVERNMENT'S AMENDED LIST OF EXHIBITS

Comes now the United States of America by the undersigned counsel and files the attached amended list of exhibits which the Government may offer at trial and requests leave to further amend this list as needed.

Respectfully submitted,

Teresa A. Moore
United States Attorney

By */s/Alison D. Dunning*

Alison D. Dunning
David Luna
Assistant United States Attorneys
Special Victims Unit
Charles Evans Whittaker Courthouse
400 East Ninth Street, Suite 5510
Kansas City, Missouri 64106
Telephone: (816) 426-3122
Alison.Dunning@usdoj.gov

Kyle P. Reynolds
Trial Attorney
Authorized to practice under L.R. 83.5(i)
1301 New York Avenue, NW
Washington, DC 20005
Telephone: (202) 616-2842

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on May 7, 2023, to the Electronic filing System (CM/ECF) of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/Alison D. Dunning

Alison D. Dunning

Assistant United States Attorney

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLINT ROBERT SCHRAM,

Defendant.

Case No. 20-06002-01-CR-SJ-DGK

EXHIBITS

- ✓ = Offered & admitted without objection.
X. = Offered & admitted over objection.
Ex. = Offered, but objected to and excluded.
N.O. = Marked but not offered.
D.B. = Admitted, de bene.
W.D. = Offered then withdrawn.
Ltd. = Admitted for limited purpose.

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
I. <u>Screenshots and Downloads from Websites A, B, C, and D</u> (1 - 99)				
1				Screenshot of Website A Login/Home Page
2				Screenshot of Website A Chat Window
3				Screenshot of Website A Chat Window
4				Screenshot of Website A Chat Window

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
5				Screenshot of Website A Chat Window
6				Screenshot of Website A Chat Window
7				Thumbnails of Files Obtained Through Website A (OBSCENE)
7A				“K...mp4” Video (OBSCENE) (Physical Item)
7B				Contact Sheet for “K...mp4” Video (OBSCENE)
7C				Screenshots of “K...mp4” Video (OBSCENE)
7D				“2017...mp4” Video (OBSCENE) (Physical Item)
7E				Contact Sheet for “2017...mp4” Video (OBSCENE)
7F				“(P...mp4” Video (OBSCENE) (Physical Item)
7G				Contact Sheet for “(P...mp4” Video (OBSCENE)
7H				Screenshot of Website A Logout Screen (OBSCENE)
8				Screenshot of Website B Login/Home Pages
9A				Screenshot of Website B Chat Screen

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
9B				Screenshot of Website B Chat Screen
10				Expanded View of Website B Tags
11				Website B Chat Screen
12A				"1...jpg" Image File (OBSCENE)
12B				"10 Cuties" Thumbnail Images (OBSCENE)
13				Screenshot of Website C Login/Home Page
14				Expanded View of Website C Tags
15				Screenshot of Website C Chat Screen
16A				Contact Sheet for "full...mp4" (OBSCENE)
16B				Multiple Videos "8...mp4" (OBSCENE) (Physical Item)
16C				Thumbnail View of "8...mp4" Videos (OBSCENE)
16D				Contact Sheets for "8...mp4" Videos (OBSCENE)
17				Screenshot of Website D Home/Login Page

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
18				Screenshot of Website D Chat Window
19A				“full...mp4” Video (OBSCENE) (Physical Item)
19B				Contact Sheet for “full...mp4” Video (OBSCENE)
20A				“Safety” Page (OBSCENE)
20B				Screenshot of “Safety” Page
20C				Screenshot of “Safety” Page
21				Screenshot of Website A Staff Notes
22				Website A Staff Notes
22A				Website A Guide
22B				Website A Guide
22C				Website A Guide
22D				Website A Guide
22E				Website A Guide

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
23				Website A Staff Notes
24				Screenshot of Website A Chat Screen
25				Screenshot of Website A Chat Screen
26				7A clip - "K...mp4" Video (OBSCENE) (Physical Item)
27				7D clip - "2017...mp4" Video (OBSCENE) (Physical Item)
28				16B clip - Sample1.mp4 (from Multiple Videos "8...mp4") (OBSCENE) (Physical Item)
29				16B clip - Sample2.mp4 (from Multiple Videos "8...mp4") (OBSCENE) (Physical Item)
30				19A clip - "full...mp4" Video (OBSCENE) (Physical Item)
31-50				RESERVED
51				Website A Chat (Redacted)
52				Website C Login Page
53				Website C Chat

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
54				Website A Chat
55				Website B Login Page
56				Website B Chat
57				Website B Chat
II. <u>Google Content</u> – (100-199)				
100				12.23.18 ClintRSchram Gmail – Google search – Hidden service hosting
101				12.21.18 ClintRSchram Gmail – Google search – Whonix
102				4.18.19 ClintRSchram Gmail – Google search – Russian teen porn
103				4.28.19 ClintRSchram Gmail – Google search – Russian teen porn
104				1.17.20 ClintRSchram Gmail – Google search – [term relating to Website D]
105				1.19.20 ClintRSchram Gmail – Google search - Torguard

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
106				1.22.20 ClintRSchram Gmail – Google search – [term relating to Website D]
107				1.13.20 Email to ClintRSchram Gmail from Torguard – Invoice
108				1.13.20 Email to ClintRSchram Gmail from Torguard – Payment
109				1.13.20 Email to ClintRSchram Gmail from Torguard – VPN Activation
110				3.5.19 ClintSchram Gmail – Google search – Tor hidden service
111				3.5.19 ClintSchram Gmail – Google search – Create a vanity onion
112				3.5.19 ClintSchram Gmail – Google search – Tor hidden service setup
113				3.5.19 ClintSchram Gmail – Google search – How to host your own Tor hidden service
114				3.5.19 ClintSchram Gmail – Google search – Tor hidden service
115				3.6.19 ClintSchram Gmail – Google search – How to set up a deep website

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
116				7.31.19 ClintSchram Gmail – Google search – GNU privacy guard
117				8.16.19 ClintSchram Gmail – Google search – How to hide and encrypt your top secret files like the CIA
118				8.16.19 ClintSchram Gmail – Google search – Disk Encryption
119				8.16.19 ClintSchram Gmail – Google search – OPSEC (operational security)
120				8.20.19 ClintSchram Gmail – Google search – Latest Pedobear GIFs
121				8.22.19 ClintSchram Gmail – Google search – VPN Articles
122				8.28.19 ClintSchram Gmail – Google search – Whonix and Kali Linux
123				9.9.19 ClintSchram Gmail – Google search - [term relating to Website D]
124				9.14.19 ClintSchram Gmail – Google search – Metadata Anonymization Toolkit
125				11.10.19 ClintSchram Gmail – Google search - Linux distros

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
126				Rule 902 Certificate of Authenticity – ClintRSchram Gmail
127				Rule 902 Certificate of Authenticity – ClintSchram Gmail
128				Clintrschram Gmail – subscriber information
129				Clintschram Gmail – subscriber information
III. <u>Photos Taken and Devices Seized from 8524 Ava Avenue, Kansas City, Missouri</u> – (200-299)				
200				Search Warrant Photo (SCHR_01019)
201				Search Warrant Photo (SCHR_01020)
202				Search Warrant Photo (SCHR_01076)
203				Search Warrant Photo (SCHR_01077)
204				Search Warrant Photo (SCHR_01023)
205				Search Warrant Photo (SCHR_01025)
206				Search Warrant Photo (SCHR_01071)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
207				Search Warrant Photo (SCHR_01074)
208				Search Warrant Photo (SCHR_01070)
209				Search Warrant Photo (SCHR_01039) (Redacted)
210				Search Warrant Photo (SCHR_01054)
211				Search Warrant Photo (SCHR_01055)
212				HP Pavilion Tower, Model: 510-P114 (Physical Item)
213				2TB SATA Hard Drive (Physical Item)
214				64GB PNY USB Drive (Physical Item)
215				Western Digital WD Elements Hard Drive (Physical Item)
IV. <u>Forensic evidence from devices</u> – (300-499)				
300				Clint R. Schram resume (from 4TB External Drive)
301				Clint R. Schram thank you letter dated April 3, 2019 (from 4TB External Drive)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
302				Clint R. Schram thank you letter dated April 5, 2019 (from 4TB External Drive)
303				Screenshot of desktop – Randstad ADP Employee Identification Number for Clint Schram (from 4TB External Drive)
304				Screenshot of desktop – Randstad ADP Employee Eligibility Verification for Clint Schram (from 4TB External Drive)
305				Screenshot of desktop – Website A home page (from 4TB External Drive) (OBSCENE)
305A				Redacted copy of Exhibit # 305
306				Screenshot of desktop – Website A Administrative functions page (from 4TB External Drive)
307				Screenshot of desktop – Website A chat (from 4TB External Drive)
308				Screenshot of desktop – Website A chat (from 4TB External Drive)
309				Screenshot of desktop – Website A test chat (from 4TB External Drive)
310				Screenshot of desktop – Website A test chat (from 4TB External Drive) (OBSCENE)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
310A				Redacted copy of Exhibit # 310
311				Screenshot of desktop – Website A test chat (from 4TB External Drive) (OBSCENE)
311A				Redacted copy of Exhibit # 311
312				Screenshot of desktop – Website B home page (from 4TB External Drive) (OBSCENE)
312A				Redacted copy of Exhibit # 312
313				Screenshot of desktop – Website B testing/training chat (from 4TB External Drive)
314				Screenshot of desktop – Website B testing/training chat (from 4TB External Drive)
315				Screenshot of desktop – Website B chat (from 4TB External Drive)
316				Screenshot of desktop – ThePedoWiki Main Page (from 4TB External Drive)
317				Screenshot of desktop – Topic Links 2.0 (from 4TB External Drive)
318				Screenshot of desktop – Website C home page (from 4TB External Drive)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
319				Screenshot of desktop – Logos (from 4TB External Drive)
320				Screenshot of desktop – Website C home page (from 4TB External Drive) (OBSCENE)
320A				Redacted copy of Exhibit # 320
321				Screenshot of desktop – Website C chat (from 4TB External Drive)
322				Screenshot of desktop – Website C chat (from 4TB External Drive)
323				Screenshot of desktop – Website C chat (from 4TB External Drive) (OBSCENE)
323A				Redacted copy of Exhibit # 323
324				Screenshot of desktop – Website C chat (from 4TB External Drive)
325				Screenshot of desktop – Website C chat (from 4TB External Drive)
326				Screenshot of desktop – Website C chat (from 4TB External Drive)
327				Screenshot of desktop – Website C chat (from 2TB External Drive)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
328				Screenshot of desktop – Gifs (from 4TB External Drive)
329				How to host a hidden service with a LEMP stack html (from 2TB from HP desktop)
330				Screenshot of desktop – Whonix Workstation and The Pedo's Whonix Guide (from 2TB from HP desktop)
331				The Pedo's Whonix Guide (from 2TB from HP desktop)
332				Whonix Guide (full text)
333				Bash history (from 2TB from HP desktop)
334				Powerpoint summary – Whonix Guide and bash history
335				Screenshot of desktop – Web Design Tutorials and Articles (from 4TB External Drive) (OBSCENE)
335A				Redacted copy of Exhibit # 335
336				Screenshot of desktop – Oracle VM VirtualBox Manager (from 2TB from HP desktop)
337				Screenshot of desktop – Google speed test (from 2TB from HP desktop) (OBSCENE)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
337A				Redacted copy of Exhibit # 337
338				Screenshot of desktop – GPA GNU Privacy Assistant and TorGuard (from 4TB External Drive)
339				Screenshot of desktop –GNU Privacy Assistant – Generate Key (from 4TB External Drive)
340				Screenshot of desktop – Metadata Anonymisation Toolkit GNU (from 4TB External Drive)
341				Screenshot of desktop – Tor Browser Preferences – Security Level (from 4TB External Drive)
342				Screenshot of desktop – Safety and Security advice for on-topic browsing the dark web (from 4TB External Drive)
343				Screenshot of desktop – Downloading Tails upgrade (from 4TB External Drive)
344				Screenshot of desktop – LEA & Antis (from 4TB External Drive)
345				Screenshot of desktop – 3 ways to get busted on the Dark Web (from 4TB External Drive)
346				Screenshot of desktop – Dark web crime markets targeted by recurring DDoS attacks (from 4TB External Drive)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
347				Screenshot of desktop – 7 Ways the Cops Will Bust You on the Dark Web (from 4TB External Drive)
348				Screenshot of desktop – Meet the Hacker Who Busts Child Pornographers on the Dark Net (from 4TB External Drive)
349				Screenshot of desktop – The scariest hacks and vulnerabilities of 2019 (from 4TB External Drive)
350				Screenshot of desktop – child exploitation chat (from 4TB External Drive)
351				File – ThePedoWiki password (from 4TB External Drive)
352				File – Archive password (from 4TB External Drive)
353				File – elude email password (from 4TB External Drive)
354				File – admin password (from 4TB External Drive)
355				File – Website A password (from 4TB External Drive)
356				File – Website B private key document (from USB)
357				File – Website C admin password (from 4TB External Drive)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
358				File – Website C password (from 4TB External Drive)
359				Screenshot of desktop – folders and files (from 2TB from HP desktop)
360				Screenshot of desktop – Website C File Manager (from 2TB from HP desktop)
361				Screenshot of desktop – Website B test chat backups (from 4TB External Drive)
362				Tor user specific configuration file (from 2TB from HP desktop)
363				File - Password
364-400				RESERVED
401				Lab Results HAR –158 (HARCFL Item No. 135829) derivative evidence disk by FE Brian Karlstrand, dated 5.01.23 (Physical Item)
402				Contact Sheet for 10yr shows...(OBSCENE)
403				Contact Sheet for 11yo Cute...(OBSCENE)
404				Contact Sheet for BW... (OBSCENE)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
405				Contact Sheet for Ch... show (OBSCENE)
406				Contact Sheet for girl in... (OBSCENE)
407				Contact Sheet for Inappropriate... (OBSCENE)
408				Contact Sheet for pe8... (OBSCENE)
409				Contact Sheet for Two...girls (OBSCENE)
410				Contact Sheet for ...7... (OBSCENE)
V. <u>Drawings Obtained from Clint Schram</u> – (500-599)				
500				“Pedo Park” Drawing
VI. <u>Excerpts of Schram Interview</u> – (600-699)				
601				18:09-19:20 (Tr. pp. 13-14)
602				21:08-22:27 (Tr. pp. 15-16)
603				24:19-25:00 (Tr. p. 18)
604				26:52-27:06 (Tr. p. 19)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
605				27:52-29:08 (Tr. pp. 20-21)
606				29:28-31:33 (Tr. pp 21-23)
607				32:11-32:37 (Tr. p. 23)
608				33:40-34:34 (Tr. pp. 24-25)
609				35:33-36:31 (Tr. pp. 26-27)
610				38:04-38:32 (Tr. p. 28)
611				41:17-42:54 (Tr. pp. 30-31)
612				53:48-54:01 (Tr. p. 39)
613				57:24-58:31 (Tr. pp. 42-43)
614				59:05-1:00:02 (Tr. pp. 43-44)
615				1:01:29-1:02:06 (Tr. p. 46)
616				1:07:18-1:07:58 (Tr. p. 51)
617				1:08:39-1:09:11 (Tr. p. 52)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
618				1:09:31-1:12:28 (Tr. pp. 52-54)
619				1:14:51-1:15:14 (Tr. p. 56)
620				1:53:52-1:54:46 (Tr. p. 77)
621				1:55:47-1:56:21 (Tr. p. 78)
622				1:57:25-1:57:51 (Tr. p. 79)
623				2:00:53-2:01:11 (Tr. pp. 81-82)
624				2:02:58-2:03:21 (Tr. p. 83)
625				2:07:58-2:08:58 (Tr. pp. 87-88)
626				2:10:16-2:11:27 (Tr. pp. 89-90)
627				2:16:11-2:16:26 (Tr. p. 93)
VII. <u>Documents and Records</u> – (700-799)				
700				Demonstrative exhibit (Jim Fottrell)
701				Report (FD-302) of FBI SA Aaron Butzin dated March 27, 2023 (SCHR_05038)

EXHIBIT NUMBER	ACTION TAKEN	DATE	TIME	DESCRIPTION
702				HARCFL Report of Examination dated March 25, 2021, signed by Examiners Brian Karlstrand and Amy Corrigan (SCHR_04840-04851)
703				Transcript of Clint Schram's interview (Redacted)
703A				Transcript of Clint Schram's interview (Unredacted)
704				United States' Notice of Expert Witnesses Pursuant to Federal Rule of Criminal Procedure 16 (ECF No. 71)
705				Website Chart - Demonstrative
706				HARCFL Technical Report dated April 20, 2023, signed by Examiner Brian Karlstrand (SCHR_06806)
707				HARCFL SATA hard drive - derivative evidence (HARCFL125322) (Physical Item)
708				HARCFL Technical Report dated May 1, 2023, signed by Examiner Brian Karlstrand